

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

JOSHUA SOSA,
a/k/a "Sos,"
a/k/a "Sos the Ghost,"

Defendant.

Index. No. 17 Cr. 580 (NRB)

NOTICE OF MOTION TO SUPPRESS

PLEASE TAKE NOTICE that upon the accompanying: (i) Affidavit of Rita M. Glavin in Support of Motion to Suppress and attached Exhibits, and (ii) the memorandum of law submitted in support of this motion, Defendant Joshua Sosa, by and through his counsel, hereby moves this Court, before the Honorable Naomi Reice Buchwald, United States District Judge, United States District Court, Southern District of New York, 500 Pearl Street, New York, NY 10007, on May 23, 2018, for the following relief:

1. For an order suppressing all evidence obtained as a result of two constitutionally improper identification procedures in violation of Defendant Mr. Sosa's constitutional rights, or in the alternative, for an evidentiary hearing pursuant to United States v. Wade, 388 U.S. 218 (1967);
2. For leave to file any additional motions that may become necessary or applicable to Mr. Sosa; and
3. For such other and further relief which this Court may deem just and proper.

Dated: May 23, 2018
New York, New York

Respectfully submitted,

By: s/ Rita M. Glavin
Rita M. Glavin
Andrew S. Jacobson

SEWARD & KISSEL LLP
One Battery Park Plaza
New York, New York 10103
Tel. (212) 574-1200
Fax: (212) 480-8421
glavin@sewkis.com
jacobsona@sewkis.com

Attorneys for Defendant Joshua Sosa